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January 28, 2020

Hon. J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
Courtroom 706
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Lev Parnas respectfully moves for modification of the terms of his pre-trial release, to allow him to travel to Washington DC tomorrow, to attend the Senate trial with his counsel. Earlier this afternoon, I received an e-mail from Amy Mannering, Director of Operations for Senator Chuck Schumer's Office, informing that my request for tickets to the trial had been granted. Mr. Parnas, Ms. Schuman and I are allowed to attend tomorrow, Wednesday, January 29th from 12:30 to 2:45 pm. (Exhibit A).

SDNY USPTO Dennis Khilkevich advises that, for this to be achieved, Mr. Parnas would first have to travel to New York to have his GPS monitoring device removed, so that he is permitted to enter the Senate Gallery. (Exhibit B). Mr. Parnas would then travel with counsel to DC, and return to New York at the end of the proceeding to have the GPS device replaced.

I have communicated with the Government, which does not object to Mr. Parnas attending the Senate trial, but does object to removal of his GPS monitoring device. I have also spoken with Pre-Trial Services Officer Dennis Khilkevich, who defers to the Government.

Thank you in advance for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy

cc: All Counsel (e-mail)
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